

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

In re:)
)
JONATHAN & DEBRA MOGG,) Case No.: 05-34066
)
Debtors.)

MOTION TO REOPEN CHAPTER 7

COME NOW the Debtors, Jonathan and Debra Mogg, by and through their attorneys, the Law Offices of Mueller & Haller, L.L.C., and for their Motion to Reopen Chapter 7, state as follows:

1. That the Court entered an Order on December 19, 2005 discharging the debtors' Chapter 7 bankruptcy.
2. That the bankruptcy case was closed by the Court on January 10, 2006.
3. That the Debtors request their case be reopened in order for Debtors' counsel to file Complaints for Sanctions, Actual Damages, Punitive Damages and Fees against Consumer Collection Management, Inc., AFNI, Inc. and Midwest Collection Services, Inc. for violation of the Fair Credit Reporting Act, Fair Debt Collection Practices Act, Fair Credit Billing Act and Discharge Injunction.

WHEREFORE, the Debtors pray this Court to enter an Order reopening their Chapter 7 petition.

JONATHAN & DEBRA MOGG,

/s/ James J. Haller

William A. Mueller - #06187732

Michael K. Read - #06238993

James J. Haller - #06226796

Attorney for Debtor

5312 West Main Street

Belleville, Illinois 62226

(618) 236-7000

**NOTICE OF ELECTRONIC FILING AND
CERTIFICATE OF SERVICE BY MAIL**

STATE OF ILLINOIS)	Case No.: 05-34066
)	SS
CITY OF BELLEVILLE)	Chapter 7

Jennifer Schweiger, being duly sworn, deposes and says:

Deponent is not a party to the action, is over 18 years of age, and resides in St. Clair County, Illinois.

On June 4, 2007, Deponent electronically filed with the Clerk of the U. S. Bankruptcy Court a Motion to Reopen.

The Deponent served electronically the Motion to Reopen to the following parties:

US Trustee

US Bankruptcy Court

Donald Samson

and served by mail to the following parties:

AFNI, Inc.
PO Box 3427
Bloomington, IL 61702

Gregory Donovan
404 Brock Dr.
Bloomington, IL 61701

Ronald Greene
404 Brock Dr.
Bloomington, IL 61701

Jonathan & Debra Mogg
508 State st.
Dupo, IL 62239

Consumer Collection Management, Inc.
PO Box 1839
Maryland Heights, MO 63043

Robert L. Eichorn
PO Box 1839
Maryland Heights, MO 63043

Midwest Collection Services, Inc.
PO Box 280
Florissant, MO 63032

CT Corporation System
208 S. LaSalle St., Ste. 814
Chicago, IL 60604

Michael Reilly
1843 Partridge Berry Dr.
Florissant, MO 63031

by depositing a true copy of same, enclosed in a postage paid properly addressed wrapper, in a

Belleville City Branch, official depository under the exclusive care and custody of the United States Postal Service, within the State of Illinois.

By: /s/ Jennifer Schweiger